

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 JUN 11 AM 8:45

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE STATE OF DELAWARE

HELEN D. MARTIN, Pro Se

Plaintiff

C. A. No.: 06-303 (GMS).

v.

PACHULSKI, STANG, ZEIDL,
YOUNG & JONES, P.C.

Defendant.

PLAINTIFF RULE 26(a) DISCLOSURES

Plaintiff, Helen D. Martin, Pro Se discloses the following items pursuant to Federal Rule of Civil Procedure 26a:

1. Individuals likely to have discoverable information that may be used to support the claims or defenses.

RESPONSES:

This information will be forthcoming.

2. Documents in possession that may be used to support the claims or defenses.

RESPONSES:

- (a) Letter response to State of Delaware, Mr. Willis, dated February 25, 2004;
- (b) Internal Medicine history sheet; for Plaintiff, dated May 20, 2003;
- (c) E-mail from Donna Carr, dated January 14, 2003;
- (d) E-mail from Jason Griffith, dated December 30, 2002;
- (e) E-mail from Ray Slough, dated December 30, 2002;
- (f) E-mail from Laura Davis Jones, dated December 31, 2002;

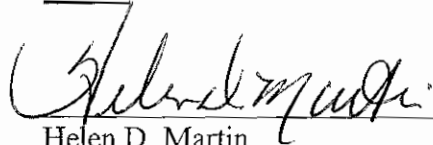
- (g) E-mail from Kathy Wittig, dated December 23, 2002;
- (h) E-mail from Paula Galbraith, dated December 18, 2002;
- (i) E-mail from Andrea Paul, dated December 3, 2002;
- (j) E-mail from Louise Tuschak, dated November 26, 2002;
- (k) E-mail from Vanessa Preston, dated November 13, 2002;
- (l) E-mail from Mary Corcoran, dated October 29, 2002;
- (m) E-mail from Plaintiff, dated October 3, 2002;
- (n) E-mail from Plaintiff, dated September 12, 2002;
- (o) E-mail from Plaintiff, dated September 4, 2002;
- (p) E-mail from Holly Walsh, dated July 8, 2002;
- (q) E-mail from Plaintiff (with attached Memo, dated April 24, 2002;
- (r) E-mail from Jason Griffith, dated October 16, 2002 and;
- (s) E-mail from Ashley Grasty, dated September 13, 2001.

Additional information will be forthcoming.

4. Additional information will be admitted, forthcoming and produced in Discovery Documentation.

HELEN D. MARTIN

Pro Se

A handwritten signature in cursive script, appearing to read "Helen D. Martin", written over a horizontal line.

Helen D. Martin
3 E. 24th Street
Wilmington, DE 19802
(302) 888-0236

DATED: June 11, 2007

CERTIFICATE OF SERVICE

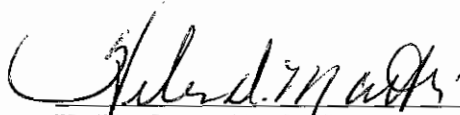
I, HELEN D. MARTIN certify that on this 11th, day of June, 2007 I caused an original of the **Plaintiff's Rule 26(a) Disclosures** to be served via HAND DELIVERY on:

HAND DELIVERY

U.S. District Court
District of Delaware
844 King Street, 4th Floor
Wilmington, DE 19801

HAND DELIVERY

Richard R. Wier, Jr., Esquire
Richard R. Wier, Jr., P.A.
Two Mill Road, Suite 200
Wilmington, DE 19806
Attorney for Defendant

A handwritten signature in cursive script, appearing to read "Helen D. Martin", is written over a horizontal line.

HELEN D. MARTIN

Pro Se

February 25, 2004

VIA FAX (302)761-6601 AND REGULAR MAIL

RE: Martin v. Pachulski, Stang, Ziehl, Young & Jones
Case No. 0301839/17CA300191

Mr. Stephen J. Willis
State of Delaware
DOL/DOIA
4425 North Market Street
Wilmington, DE 19802

Dear Mr. Willis:

Thank you for your recent letter dated February 17, 2004 received by me on February 19, 2004. My response to your letter is listed paragraph by paragraph according to your letter.

I have strong feelings that I was discriminated upon due to numerous work-related conditions, as well as being black. My employment began January 2000, I was the only black supervisor at that time within the Delaware Office. A hostile work environment was definitely a non-professional demeanor. Communication to me as being DE File room supervisor was strongly terrible. Being described negatively to perspective employee candidates in a negative fashion, verbal communication should never occur. On 9/11/01 Mr. Stang along with Mr. Grohsgal appeared at my office door were I was conducting company business to let me know that he Mr. Stang was in charge. Ms. Jones had approached me in August of 2000 and advised me that she would be given the file room a pay raise. Effective January 27, 2003 my employment with the firm came to an end I am certain that cultural diversity was mention.

I would expect the firm to say that discrimination is not the case, why would they say different.

As above mentioned Mr. Stang and Mr. Grohsgal did appear at my office door were I was conducting office business, ignoring him did not take place, Mr. Stang explained whom he was and that he was in charge, Once never did he ask if I had spoken with file room employees, etc. Had he come to me to see correctly or allow the time for me to explain he would have known what had previously taken place. I assure you that I handle situations within a correct and professional way. My co-workers and I had agreed that we would all stay and work together which would allow everyone to leave when we were told to do so. As mentioned in your correspondence, yes he did immediately thereafter let everyone leave early, why because two persons complained to him when he should have asked me being the supervisor what had taken place. He never once asked me anything at all, if he had done so he would have known why we were all continuing to conduct company business.

Ms. Johnson did badmouth me. As mentioned above being described negatively to perspective employee candidates in a negative fashion, verbal communication should never occur. (You should have copy of written information of file). Is this the reason why some white co-workers continuously disrespected me as well as had no regard for or adhere to company policies as well as procedures.

Communication referencing the DE File room ran at an all time low. Just to name a few situations which did occur, the Bankruptcy Court for the state of Delaware went to Electronic filing, the DE file room had never received written or verbal notification, nor was told the DE File room would have to prepare Hearing Binder for the DE Bankruptcy Court Judges. This

Mr. Stepehn J. Willis
February 25, 2004
Page 2

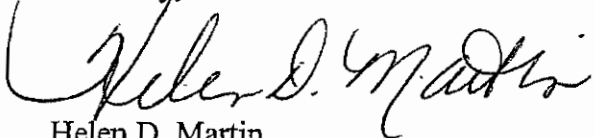
information was verbally communicated to be via a secretary as well as a paralegal. I am sure that management knew this was taken place in a timely manner, therefore, why was I not informed since the situations had a tremendous impact on the work related duties/production pertaining to the DE file room.

Referencing the annual raise, is definitely not the given factor, due to the fact that I had no ideal of what my raise was to be at that time. I did in fact ask Ms. Jones for a raise, at this time she state that she need to compare the job duties which I performed against the other firms. Given the fact that Ms. Jones was aware that most firms file room employees did not prepare Hearing Binders for the court. Not to mention that other co-workers (secretaries/paralegal) had asked for raises and had received them. Also, promotions were given to other coworkers as well. Yes, I did walk off the job on two different occasions, also I did return. After both occurrences I was assured that things would improve, hoping to see improvement the work related environment became worse.

At the time of my employment with the firm, I am certain that I was the only black. However, if there were others is the DE office I knew nothing of them, nor did the firm, there was none. You mention Lawrence Newton and Vanessa Preston. Given the fact that when I was an employee at the firm Mr. Newton and another co-worker was the IT Department and Ms. Preston was a workflow coordinator. The fact is that the comparison of the job duties/responsibilities which I performed are at all no comparison. Neither of the above mention supervised and/or managed any given number of personnel as I did nor did they perform the duties/responsibilities.

Additional information is provided to you within this documentation. White co-workers were given promotions (Kim Garza worked in DE file room for 2 weeks, promoted to secretary, Melody Olson worked in DE file room for 6 months, promoted to a paralegal); [was this communicated to me in a timely manner allowing me to prepare my staff. Not at all.] I was told and they were off to their new positions.) as well as salary/rate increases, (Amy Miles, Kim Garza, Melody Olson) additional rate/salary increase, not for promotions. Blacks were not offered any type promotions as well as promised but never received a pay raise. Not to mention the fact that blacks were terminated soon rather than whites later. I am not aware of the State of Delaware procedures in handling this type situation, however, perhaps some documentation/personnel records, etc. should be pulled along with being reviewed referencing some of the issues mentioned above.

Sincerely,



Helen D. Martin
616 8th Street
Wilmington, DE 19801
(302) 888-0236

hdm/EEOC
Enclosure(s), (arriving via regular mail)

Miss HELEN MARTIN Home: (302)888-0236 Office: 302-571-4745
Female DOB: 03/26/1959 1318774-0220001

01/13/2003 - Office Visit: Est. adult pt.
Provider: Julie Silverstein MD
Location of Care: Internal Medicine Faculty Practice

VITAL SIGNS

Initial BP: 112/80

Pulse: 84

Weight: 144 pounds

.....Frances Forrest RN January 13, 2003 10:18 AM

History from: patient

Chief Complaint: stress

History of Present Illness: Having problem with management at work (works at law firm that deals with bankruptcy) *(jhr)*

Gave 2 week notice today - hates to go to work; has headache as long as she is there

Can't sleep at night - wants something to help her sleep

Appetite poor

Headaches are not relieved with aspirin, tylenol or advil - across the brow; already took 7 advil today

Headache is still there on the weekends but she is still on work issues despite not being physically there she gets calls, etc.

Past Medical and Surgical History:

Past Problems:

HIP PAIN, LEFT (ICD-719.45)

TOBACCO USE DISORDER (ICD-305.1)

NYSTAGMUS, CONGENITAL (ICD-379.51)

GLAUCOMA, OPEN-ANGLE W/BORDERLINE FINDINGS (ICD-365.01)

VAGINITIS NOS (ICD-616.10)

Other Past Problems:

s/p tubal ligation by Dr. Tilden-Burton

Past medical/surgical history reviewed.

Current Medications:

BETIMOL SOLN 0.25 % (TIMOLOL) Using BID - ?strength not actually known.

Current medications reviewed; compliance discussed with patient.

No Known Allergies.

Social History:

Social history reviewed.

Marital status: Single

Employment status: Full-time

Social History:

Living Situation: Alone

Exercise: 0 times per week.

Psychology:

Patient complains of sleep problems.

Patient denies depression.

Helen Martin

From: Donna Carr
Sent: Tuesday, January 14, 2003 10:22 AM
To: Helen Martin
Subject: RE: Helen

Helen-

Do you want to talk about this sometime today. I know that there's no need for a review now, but I would like to talk to you about why you're leaving. Let me know.

-----Original Message-----

From: Helen Martin
Sent: Monday, January 13, 2003 9:30 AM
To: PSZYJ - Management Committee
Cc: Donna Carr; Karen Sheeler; MaryRitchie Johnson; Kathy Wittig
Subject: Helen

January 13, 2003

Pachulski, Stang, Ziehl, Young & Jones P.C.
919 North Market Street
16th Floor
P.O. Box 8705
Wilmington, DE 19899-8705

Dear Partners,

This letter is to inform management personnel effective today, January 13, 2003, I'm resigning from the Firm.

This written notice will serve as a two (2) week notice. My last work day will be January 27, 2003.

Due to stress involved in my current DE File Room Supervisor Position, not to mention being passed over for promotions as well as previous and recent management comments.

Thank you,

Helen D. Martin

Jason Griffith

From: Kathy Wittig
Sent: Monday, December 30, 2002 8:23 PM
To: Jason Griffith
Subject: RE: Feedback

I certainly DID ask....
Thank you very much!

-----Original Message-----

From: Jason Griffith
To: Kathy Wittig
Sent: 12/30/02 5:03 PM
Subject: Feedback

When I delivered my letter of resignation earlier this evening, you asked if I had any feedback -- on the spot, I went blank (probably because I've never done this before). After a little while to think about it, I do have a few issues/suggestions/comments and I do truly appreciate your asking me. These are not things that I blame anyone for, mostly; they are simply problems that could stand to be corrected for better overall file room performance, at least from where I sit. ~~The people that we have here currently~~ are dedicated to the jobs they perform and take pride in doing them in with quality and timing in mind, but some things stand in our way at times.

First, communication isn't so hot. We do our best to keep paralegals and attorneys informed of our progress on binders and document requests, however it sometimes seems as though we're left out of the loop in matters that affect us directly. For example, I think it's great that the file room is getting two new printers and keeping an existing one. However, a third printer for the file room was requested and approved during a meeting with Laura back in May of this year. We've needed this desperately since before the request was made thanks to the growth in cases within the firm and have done the best we can under the circumstances. A message of any kind keeping us updated on something like this would have been fabulous.

Second, and on something of a more specific level relating to my own duties here, something has to be done about the space allocated to the file room in on-site storage. I manage the majority of the Iron Mountain boxes that are on-site from start until just before IM comes to get them, and with massive cases like Federal Mogul, Inacom, Ameriserve and seemingly Peregrine, it's becoming nearly impossible for me to continuously shuffle these boxes around and have it make sense. I don't know what the answer here is, but the three rooms in addition to the cabinet space I have available on the 15th floor is not nearly enough to keep the process flowing smoothly. There are three components to our file management system once something leaves the file room; it will go across the hall, then downstairs into one of the cabinets (where applicable -- not all clients have cabinet space), and finally into an IM box in one of our three rooms. Currently, two of the three areas (the cabinets and the rooms) have zero room for growth and the remaining component -- the stacks across the hall from the main file room, are suffering because of it. I'd be happy to show you exactly what I mean if you're interested in seeing the problem first-hand.

As an observation, Kathe Finlayson is by far the best paralegal in the DE office. I've had the pleasure of working with her on two massive binder-related projects, TWA and Inacom, over the past four months. She carries almost an extreme level of dedication to her work and it was easy to see how insanely organized she is. I often feel as if I don't "deserve" to work with her, as she is ridiculously on the ball.

On a similar subject, Helen is irreplaceable to the functions of the file room. She knows what she is doing in all aspects of the work she performs and can simultaneously monitor the progress of the employees under her command with tremendous skill. I have never worked for a supervisor with so many excellent qualities and am truly sad to be leaving her.

The propensity for the blame of disputes and problems to be leveled at the file room is harsh, at best. I have an understanding of how it works -- for example, paralegals are fewer and further between than file room staff so it is advantageous to let those of us on the bottom rung take the fall when a problem arises. We're certainly not perfect, but by that token, neither is anyone else (with the possible exception of Kathe). It would be nice if management would tell us when we're right as well as when we're wrong, but that doesn't seem to be the case, currently. Twice in my 16 months here I have had my job directly threatened for no valid or fair reason. Both occurred in specific meetings, were for two separate "accusations", if you will, and both were unfounded. I did not appreciate those experiences. In the weeks that followed each instance I dreaded being here for fear of losing my job for things that did not even happen. Life is not fair, indeed, but it should not intentionally be made that way. A less personal example of the blame seemingly being automatically cast on the file room is the time-entry instance from October of this year, I believe, where several file room employees' times did not register in Juris for the month. The IT department seemed to assume it was an error in entry, even after each of the employees who had this problem were observed entering their time. I don't know if the solution was ever found to this, but I remain confident, since I was one of those people who had the problem apparently, that it was not an error from our end.

On a more positive note, I can't express my gratitude enough for the flexibility of scheduling. I've been all over the place in that aspect since I started here and the accommodation shown to me is infinitely appreciated. My ability to both work and attend classes at college simultaneously is one of the main reasons I am able to take this step in moving to Utah.

I have been working here full time since September 20th, 2001, and started here part time on August 1, 2001. All together I have been here for nearly 17 months. I am generally a mild and quiet person, especially outside of the file room and in life in general. However I found it peculiar that despite my length of term here, Laura did not know who I was when passing out holiday bonus checks a few weeks ago. This isn't a hell-worthy trespass or anything like that, but I think it speaks to the lack of communication between all the various levels here that we don't at least know each other's names. It's not as if we have hundreds or thousands of people employed in the office.

Finally, I'm not sure that this is appropriate or not but I'll throw it out there anyway. The file room is sorely underpaid for the jobs that we perform within the firm. If the firm is as successful as we're told, and we have no reason to believe otherwise, and we obviously make a measurable contribution to that success, why are we paid just barely enough to get by? I'm thankful that I own my car; otherwise, if I had even a reasonable payment to make on it I would not have been able to live on my own from the beginning of this year through August. I don't lead an excessive lifestyle or anything of that nature so at the end of the month I was often left scratching my head as to why ends were meeting with little room to spare. On the flip side of that, the firm's medical coverage is excellent. I'm proud to say that my coverage here is better than either of my parents have at their respective careers. I chose to take the ignorant route with other benefits such as flex-plans and the 401(k) but I was equally impressed by what I saw of them as well.

Overall, as my letter says, I have found this to be a valuable learning experience, both in gaining certain skills within an office and also in Real Life (tm). I feel I've grown tremendously over the past year and a half and I have to believe that working here had something to do with that. Please forgive the long-windedness of this message, but... you asked for it. :)

Jason

Helen Martin

From: Ray Slough
Sent: Monday, December 30, 2002 6:55 PM
To: MaryRitchie Johnson; PSZYJ - File Room (DE)
Cc: Laura Davis Jones; Lawrence Newton
Subject: RE: File Room Printers

I have ordered 2 replacement high speed printers.

They print 45 pages per minute.

The existing printers print 16pages per minute. (I think)

Also, we hope to be able to keep one of the 4050 (existing printers) somewhere in the file room, for a total of 3 printers.

2 - hp 4300's and 1 of the 4050's.

OR - does anyone want a type-writer?

-Ray -2370

Helen Martin

From: Laura Davis Jones
Sent: Tuesday, December 31, 2002 12:46 AM
To: PSZYJ - File Room (DE)
Subject: Correction: file room meeting

I should have said Monday, Jan. 6 at 2:30.

Laura Davis Jones, Esquire
Pachulski, Stang, Ziehl, Young & Jones P.C.
919 North Market Street, 16th Floor
Wilmington, DE 19801
Direct Dial Telephone: (302) 778-6401
General Office Telephone: (302) 652-4100
Office Facsimile: (302) 652-4400
EMail: LJones@PSZYJ.com

-----Original Message-----

From: Laura Davis Jones
Sent: Monday, December 30, 2002 6:15 PM
To: PSZYJ - File Room (DE)
Subject: file room meeting

I understand from Helen that many of you are concerned that our last meeting had to be rescheduled. Helen communicated that because I was in the office, some of you thought we could have had the meeting. Unfortunately, my schedule is not that easy. I have constant teleconferences, meetings in conference rooms, etc. I regret that my schedule is very busy, but at the same time I am so glad we are a busy and successful office. I would like to try to reschedule for Tuesday, Jan. 6 at 2:30 p.m. Please let me know if you have a conflict with that time. I am trying to accomodate those that come in later with those who leave earlier.

Laura Davis Jones, Esquire
Pachulski, Stang, Ziehl, Young & Jones P.C.
919 North Market Street, 16th Floor
Wilmington, DE 19801
Direct Dial Telephone: (302) 778-6401
General Office Telephone: (302) 652-4100
Office Facsimile: (302) 652-4400
EMail: LJones@PSZYJ.com

Helen Martin

From: Kathy Wittig
Sent: Monday, December 23, 2002 9:44 PM
To: Helen Martin
Subject: FYI

MRJ got angry and insisted she could not suggest possibly seeing a doctor for the odor issue- see the following articles:

<http://www.ahipubs.com/FAQ/discrimination/odor.html>

http://www.employersgroup.com/Data/Newsletter/2001/02/People_Product.asp

<http://startribune.hr.com/index.cfm/46/17045F1B-1954-11D5-9ABE009027E0248F>

Helen Martin

From: Paula Galbraith
Sent: Wednesday, December 18, 2002 10:55 AM
To: Helen Martin
Subject: RE: fyi

Thanks Helen. This is why I am asking. I am still trying to learn procedure. When I understand the procedure/duties of the various people here, I can better communicate. I thought that this information was already getting to you because you were to be the keeper of the chambers/Judges procedure book that was initiated through the suggestion of Kathleen.

As it is the Paralegals who interact the most with the file room, maybe this is something that Laura could raise for you at the paralegal meeting or convey to the Delaware office as a whole as she sees fit.

I will ask Valerie to forward to you the new written procedures that J. Walrath issued and if you could convey them to your staff, that would be very helpful to all I am sure. The only other similar binder issue that I am aware of is J. Fitzgerald's rule that there are to be no certifications/affidavits of service in her binders either.

Thanks Helen.

Paula

-----Original Message-----

From: Helen Martin
Sent: Wednesday, December 18, 2002 10:43 AM
To: Paula Galbraith
Cc: Bruce Campbell
Subject: RE: fyi

Thanks Paula, yes the DE File is responsible for removing the CERT of Serv.

However, this information was not directly given to the DE File Room properly.

As of Thursday, Dec. 12, 2002 Bruce Campbell did give me instructions referencing binder for Judge Walrath. (I'm certain your binders were prepared before this time). Just think, if I was not preparing an Agenda Letter for Bruce, I would not have received this information.

Communication as far as the DE File room receiving is at a record low. We are never informed as to exactly what is taken place until something is wrong. True lack of communication referencing the DE File Room, a sad situation.

Again thanks.

Have a nice day!

HELEN!!!

-----Original Message-----

From: Paula Galbraith
Sent: Tuesday, December 17, 2002 12:50 AM
To: Helen Martin
Subject: fyi

Helen,

I have just gone through three binders that need to be filed tomorrow for a hearing this week for J. Walrath. Almost every item included the certs of service. (J. Walrath's new procedures say no certs of service in the binders) Is it the paralegal or the file room that should be removing these items for J. Walrath binders?

Just want to know so I can follow up accordingly.

Helen Martin

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Sent: Wednesday, December 18, 2002 10:43 AM
To: Paula Galbraith
Cc: Bruce Campbell
Subject: RE: fyi

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Again thanks.

Have a nice day!

HELEN!!!

-----Original Message-----

From: Paula Galbraith
Sent: Tuesday, December 17, 2002 12:50 AM
To: Helen Martin
Subject: fyi

Helen,

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Just want to know so I can follow up accordingly.

Thanks.

Paula A. Galbraith
Pachulski, Stang, Ziehl, Young & Jones P.C.
919 North Market Street
16th Floor
Wilmington, Delaware 19899-8705
Direct-302-778-6463
Facsimile-302-652-4400

Helen Martin

From: Helen Martin
Sent: Tuesday, December 03, 2002 10:21 AM
To: Andrea Paul
Subject: RE: RE: PARALEGALS AND AGENDAS

Thanks Andrea,

I've just about given up on this particular issue.

I've spoken enough referencing this matter, both to Paralegals and LDJ.

It's a definite strong point for our meeting.

Hopefully you will be here to mention this issue.

Thanks.

Have a nice day!

HELEN!!!

-----Original Message-----

From: Andrea Paul
Sent: Tuesday, December 03, 2002 10:12 AM
To: Helen Martin
Subject: RE: PARALEGALS AND AGENDAS

Good Morning Helen,

We are still having the Paralegals coming in and looking on the Roaster to see whom is working on the Agendas they have given instead of just giving any changes and or amended to whomever is in the fileroom. This morning two persons came in looked at the roaster to see whom the person's name is up there beside the Agenda and giving that person whatever needed. I know you have told them over and over but they must need a person-to-person, face-to-face by you to let them know you are serious and make them better

understand. Well I don't know but maybe hearing it from Laura will help them, I hope.

I will be bringing this up in the meeting, but I am sending this to you just incase I am not here Friday Dec. 6 for the meeting due to my surgery.

Thanks,

Andrea R. Paul

Pachulski, Stang, Ziehl, Young & Jones P.C.

PO BOX 8705

919 N. Market Street, 16th Floor

Wilmington, Delaware 19899-8705

Phone#: 302-778-6430

Fax#: 302-652-4400

APaul@PSZYJ.COM



Helen Martin

From: Louise Tuschak
Sent: Tuesday, November 26, 2002 12:26 PM
To: Helen Martin
Cc: PSZYJ - File Room (DE)
Subject: RE: AGENDA LETTERS

Everytime I bring an agenda - And give to either Rita or Violet, they go to a chart on the wall to see who is working on it - so now it's whoever is there?

-----Original Message-----

From: Helen Martin
Sent: Tuesday, November 26, 2002 12:21 PM
To: Louise Tuschak
Cc: PSZYJ - File Room (DE)
Subject: AGENDA LETTERS

Louise, you and I recently spoke about File Room personnel preparing Hearing Binders.

Perhaps verbal communication is not working for you.

Hopefully this E-Mail will assist you a little.

You are to deliver your Agenda Letter with documents to the File Room. (HEARING BINDERS ARE NOT TO GO ON THE MAIL CART).

Once Agenda Letter arrival to the file room, it's not designated to any one person.

The DE File room can not afford to have one person always preparing the same binder continuously.

We have other personnel as well.

This Agenda Letter procedure must and will be shared with all.

Sharing allows all to learn how to correctly prepare the hearing binders.

Thanks.

Have a nice day!

HELEN!!!

Vanessa Preston

From: Vanessa Preston
Sent: Wednesday, November 13, 2002 9:16 AM
To: Laura Davis Jones
Cc: MaryRitchie Johnson
Subject: Hearing Binders

It appears that some paralegals are now using their secretaries to prepare hearing binders. This is causing a problem in that the secretaries are not available to assist me with overflow work. Something needs to be done.

Today, there are 2 secretaries being asked to prepare hearing binders (one has been working on a binder since Friday and she is still not done - part of the problem is she's never worked with an agenda letter, she hasn't a clue to what she's doing.)

Preparation of the hearing binders should remain between the paralegal and the file room. This morning, the file room staff (2 people) were just talking, not working on anything. Standing around talking. Surely, they could assist with the binder that's needed this morning. I spoke with Helen about this and she said she would be willing to have them help as long as the paralegal has the documents.

Vanessa A. Preston
Pachulski, Stang, Ziehl, Young & Jones P.C.
919 N. Market Street, 16th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 18801)
Telephone: 302-652-4100
Facsimile: 302-652-4400

Helen Martin

From: Mary Corcoran
Sent: Tuesday, October 29, 2002 8:31 AM
To: Helen Martin
Cc: MaryRitchie Johnson; Kathy Wittig
Subject: RE: Your ATTITUDE towards me!

Any time is fine.

-----Original Message-----

From: Helen Martin
Sent: Tuesday, October 29, 2002 8:02 AM
To: Mary Corcoran
Cc: MaryRitchie Johnson; Kathy Wittig
Subject: Your ATTITUDE towards me!

If at all possible, I would like to meet with you some during this day.

Also, I would appreciate one personnel person to sit-in.

Thanks.

Have a nice day!

HELEN!!!

*Feed Feedback from KW
Waiting on MKJ*

Helen Martin

From: Helen Martin
Sent: Thursday, October 03, 2002 5:34 AM
To: PSZYJ - File Room (DE)
Cc: MaryRitchie Johnson; Kathy Wittig
Subject: ONE on ONE's Sessions

I'm pleased to announce that all have had their One on One's for the month of September 2002.

All seem to be pleased, as well as responsibilities are understood.

NO COMPLAINTS.

PEOPLE WORKING TOGETHER TO MAKE IT HAPPEN!

Thanks

Have a nice day!

HELEN!!!

Helen Martin

From: Helen Martin
Sent: Thursday, September 12, 2002 4:22 PM
To: MaryRitchie Johnson
Cc: PSZYJ - File Room (DE)
Subject: Personal Hygiene

Yes, again the problem has occurred.

Please help.

Thanks.

Have a nice day!

HELEN!!!

Helen Martin

From: Helen Martin
Sent: Wednesday, September 04, 2002 6:57 PM
To: PSZYJ - File Room (DE)
Cc: MaryRitchie Johnson; Kathy Wittig
Subject: MONTHLY ONE ON ONES - DE FILE ROOM

As we are aware ONE on ONES are given on a monthly basis.

We are finished for this month.

Just to mention briefly what took place, brief overview of previous month. Mention of meeting with LDJ, MRJ, Paralegals and Secretaries, (E-Mail, dated 08/19/02).

We all have had training of Scanning of Documents.

Several issues, as well as other important matters mentioned; Breaks, Responsibilities, Sharing Desk, E-Mail of Procedures; Personal Hygiene.

Thanks.

Have a nice day!

HELEN!!!

Helen Martin

From: Holly Walsh
Sent: Monday, July 08, 2002 7:24 AM
To: Helen Martin
Subject: FW: Benefits news

Importance: High

Way to go Helen, your persistence finally paid off. Thank you for your efforts on behalf of us all.

-----Original Message-----

From: Karen Sheeler
Sent: Wednesday, July 03, 2002 6:03 PM
To: PSZYJ - Everyone
Subject: Benefits news
Importance: High

First of all, I am happy to announce that effective August 1, 2002, the firm will increase its **Life Insurance** benefit to **\$100,000** for all eligible full time employees. Employees in Delaware and New York will also receive this benefit. For those of you not currently enrolled, enrollment forms will be arriving at your offices shortly. All new enrollment must be completed during Great West's open period in the month of July.

Next, I have had a number of employees inquire about the possibility of **AFLAC supplemental insurance** being made available as a voluntary pre-tax product. Employees can select one or any combination of plans, with all premiums paid through pre-tax payroll deduction. Premium payments will not be supplemented by the firm, but can be made available to eligible full time employees if enough interest exists. A quick summary is listed below, please contact me for dependent rates. The Personal policies to choose from are:

Accident Expense Plan - \$8.75 per paycheck*
Hospital Intensive Care Insurance - \$4.55 per paycheck*
Recovery Plus Plan - \$3.45 - \$16.95 per paycheck* , depending on age.
Cancer Protector Insurance - \$13.35 per paycheck*

There is also an AFLAC Dental Plan Option.

Level 2 (for employees with existing Dental insurance, maximum benefit paid per year - \$1,200) - \$11.45 per paycheck*
Level 6 (for those without dental insur. Maximum benefit paid per year - \$1400) - \$16.60 per paycheck*
Level 8 (for those without dental insur. Maximum benefit paid per year - \$1500) - \$20.35 per paycheck*

*(based on 24 yearly checks) for an individual. Plans and rates may vary slightly in states outside California, and all benefits paid to participants are taxable.

Please reply to me if you are interested in signing up for any of these AFLAC offerings by Friday, July 12. If enough of you are interested in any of these supplemental policies, I will arrange for AFLAC representatives to visit each office to give you more detailed information and we'll go from there. I realize some of these plans may not be cheap, but I want to give you the choice.
Everyone have a safe and fun-filled Fourth of July weekend !

Karen Sheeler
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Helen Martin

From: Helen Martin
Sent: Wednesday, April 24, 2002 12:26 PM
To: April Tabor; Jason Griffith; Christina M. Shaeffer
Cc: MaryRitchie Johnson; Kathleen M. Wittig
Subject: REMINDER

Follow -up of the meeting the four of us had the week of April 18, 2002.

Let's remember the respect is due for others as we wish to receive.

Our work load must/need to be continuously improved.

Personal matters should be kept outside of our work environment.

Rita is in charge until I arrive, Rita is to be respected at all times and you are to listen to her and do exactly what she is asking of you, etc.

All of the above mentioned has been brought to your attention on several different occasions, as before if you have concerns and/or problems please see MRJ.

Thanks.

Have a nice day!

HELEN!!!

Week of April 24, 2002

APRIL TABOR

WE THE FILE ROOM STAFF HAVE HAD ENOUGH.

April behavior has not improved satisfactory to our professional standards.

Misuse of breaks during overtime, etc.

Disrespect toward co-workers. (Several issues, Drew, Sheryle, and Violet, etc.)

She continues to sit in co-workers area where she should not be. (She has been told on several different occurrences, to sit at her workstation.)

Continued chatting all day/ everyday with Jason and Tina of non-work related issues, personal issues. (Informed not to conduct personal business here at work).

Not following procedures for her person use of here cell-phone, (again she has been told on several occasions).

Please see E-Mail of APRIL 24, 2002 (Attached)

Helen Martin

From: Jason Griffith
Sent: Wednesday, October 16, 2002 2:31 PM
To: Helen Martin
Subject: RE: THANKS

I'm equally grateful to be working with you. I remember during my "interview" last year, you were at a Dentist appointment when I got here so MRJ took a moment to "warn" me that you're very straight-forward, blunt, etc.. I usually don't get along very well with people like that so I was nervous/anxious when I finally did meet you. Sometime I'll have to tell you about the events that lead me here.

Working here has truly been a blessing, and I know that your presence is a big part of that. We all have our problems with the way things are sometimes but you'll find that almost anywhere you go. The compassion, understanding and patience you've shown me during the rough times (also on a day-to-day basis in things more work-related) has meant a lot to me, and usually is one of the things that helps me pull through in the end. That's why I'd have no qualms walking through fire for you, even on my lunch break.

Just don't ask me to do it on time. :)

-----Original Message-----

From: Helen Martin
Sent: Wednesday, October 16, 2002 2:18 PM
To: PSZYJ - File Room (DE)
Subject: THANKS

I'm very gratefully to work with all of you.

I'm not your boss, just the person in charge of the work.

It's nice to have all of you, sometimes we're up, sometimes down, but we all end up coming

AROUND

Again thanks.

Remember M,

Remember E,

**Thanks to you all for putting them together to
REMEMBER**

Violet Mobley

From: Ashley Grasty
Sent: Thursday, September 13, 2001 10:11 AM
To: PSZYJ - Everyone
Subject: Document Request

Due to Helen's absence we are asking everyone to please send any document request to Ashley Grasty, April Tabor, we will be handling them. Thank you for your corporation.

*No one gave them
authority*